

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

In the matter of:	)	
	)	
Amendment of Part 97 of the	)	
Commission's Rules Governing the	)	RM-11306
Amateur Radio Service Concerning	)	
Permitted Emissions and Control	)	
Requirements	)	

Comments Regarding RM-11306

I, Roger K. Simpson, am a licensed radio amateur. I have been continuously licensed since 1958 and I presently hold the callsign K5RKS. I have held the Extra class license since 1983. I am a member of the American Radio Relay League.

INTRODUCTION

On November 14, 2005 the American Radio Relay League (ARRL) filed a petition (now known as RM-11306) to the Commission requesting an overhaul of the way various types operating "modes" are assigned sub-bands within the various amateur radio HF bands. The purported purpose of the ARRL's petition is to allow for the accommodation of various new types of communication methods which may not readily be able to be categorized in terms of the traditional "modes" now enumerated in Part 97 of the Commission's rules. These modes include "phone", "CW", "Image", "RTTY", and "Data". To eliminate such ambiguities the ARRL requests that the FCC rules be re-vamped so that sub-band allocations are based upon bandwidth rather than "modes."

DISCUSSION

I disagree with RM-11306 because it opens the floodgates for the use of unmanned "automatic" or "semiautomatic" operations ("robots") in significantly wider sub-bands than is possible in current Part 97 rules. Specifically, with 97.221 modified as requested by petitioner wideband digital "robots" (i.e. un-attended digital operations having a bandwidth of greater

than 500Hz) would be able to operate on a shared basis with phone operations such as SSB and AM.

I do not agree that SSB/AM and “robots” can by rule be allowed to co-exist. They are fundamentally different types of operations.

The vast majority of operators using traditional SSB or AM modes of operation lack the specialized equipment to be able to decode the information sent by “robots”. They have no way to identify the callsign of the “robot” station or to negotiate to resolve mutual interference problems.

Also, the current state of the art of the software/hardware that implements typical “robot” operations in the amateur radio service is not robust enough to preclude interference to phone operations that are currently in progress.

It may be advantageous to partition the amateur HF sub-bands by “bandwidth” rather than “mode”. However, in any case, “automatic” and “semi-automatic” operations must be segregated from all other operations by rule.

## CONCLUSION

This petition must be rejected. It would be acceptable if the following two points were addressed:

There must be a clear separation of “robot” operations from all other operations. There must be language such as that contained in current rules at 97.221.

As the ARRL acknowledges, there must be revisions to the “voluntary” band-plan to make the changes envisioned in this petition workable. Until effort is underway to draft a revised band plan it is premature to consider this proposal.